

COOLEY LLP
BOBBY GHAJAR (198719)
(bghajar@cooley.com)
TERESA MICHAUD (296329)
(tmichaud@cooley.com)
COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
1333 2nd Street, Suite 400
Santa Monica, California 90401
Telephone: (310) 883-6400
MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
JUDD LAUTER (290945)
(jlauter@cooley.com)
ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, California 94304-1130
Telephone: (650) 843-5000
CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
(adunning@cgsh.com)
1841 Page Mill Road, Suite 250
Palo Alto, California 94304
Telephone: (650) 815-4131

[Full Listing on Signature Page]

Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation;
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DEFENDANT META PLATFORMS, INC.'S
FURTHER RESPONSE TO COURT'S
DISCOVERY ORDER OF DECEMBER 4, 2024
[DKT. 304]**

Pursuant to the Magistrate Judge's Order on December 4, 2024 (Dkt. 304), Defendant Meta Platforms, Inc. ("Meta") hereby submits as the attached **Exhibit 1** a revised copy of Exhibit CC (Dkt. 246-14 and Dkt. 249-28) to the Parties' October 31, 2024, Joint Letter Brief (Dkt. 247), with narrowly tailored redactions. Meta respectfully submits that good cause exists for the submission of the identified portions of this document under seal for the reasons set forth in its earlier-filed Declaration of Michelle Woodhouse (Dkt. 246-1) in support of Meta's Unopposed Administrative Motion to File Under Seal (Dkt 246). Meta respectfully requests that the Court order sealed the redacted portions of revised Exhibit CC.

Dated: December 11, 2024

COOLEY LLP

By: /s/ Cole A. Poppell

Bobby Ghajar
Philip Morton
Mark Weinstein
Kathleen Hartnett
Teresa Michaud
Matthew Brigham
Judd Lauter
Liz Stameshkin
Colette Ghazarian
Juan Pablo Gonzalez
Cole A. Poppell

Full Counsel List

LEX LUMINA PLLC
Mark A. Lemley

COOLEY LLP
PHILLIP MORTON (*pro hac vice*)
(pmorton@cooley.com)
COLE A. POPPELL (*pro hac vice*)
(cpoppell@cooley.com)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 842-7800

CLEARY GOTTlieb STEEN &
HAMILTON LLP
Angela L. Dunning

Attorneys for Defendant
META PLATFORMS, INC.

COOLEY LLP
MATTHEW BRIGHAM (191428)
(mbrigham@cooley.com)
JUAN PABLO GONZALEZ (334470)
(jgonzalez@cooley.com)
3175 Hanover Street
Palo Alto, California 94304-1130
Telephone: (650) 843-5000